

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**DAVITA KEY,**

**Plaintiff,**

**v.**

**HYUNDAI MOTOR  
MANUFACTURING, ALABAMA,  
LLC; HYUNDAI ENG AMERICA,  
INC. and DYNAMIC SECURITY,  
INC.,**

**Defendants.**

**Civil Action No.:  
2:19-cv-00767-ECM**

**DEFENDANT HYUNDAI ENG AMERICA, INC.'S RESPONSIVE  
DESIGNATION OF DEPOSITION TRIAL EXCERPTS**

Defendant Hyundai Eng America, Inc. ("HEA") submits the following deposition excerpts expected to be used in response to Plaintiff's deposition excerpt designations. (Doc. 101).

**Cassandra Williams (September 6, 2022)**

Subject to HEA's objection to any party reading the deposition transcript for Cassandra Williams at trial, as she will be a witness at trial, HEA counter-designates the following excerpts from Ms. Williams's deposition transcript:

|       |          |         |           |
|-------|----------|---------|-----------|
| 15:18 | 49:18    | 76:7-13 | 101:17-21 |
| 33:7  | 50:4     | 76:22   | 106:15    |
| 34:12 | 51:10-23 | 77:21   | 111:6     |
| 35:12 | 52:4     | 80:13   | 112:12    |
| 36:8  | 55:13    | 83:5    | 118:8     |

|              |        |          |               |
|--------------|--------|----------|---------------|
| 37:13        | 55:21  | 83:11    | 118:18        |
| 41:7         | 56:5   | 83:22    | 119:1         |
| 44:15        | 56:10  | 84:10-19 | 134:23-135:7  |
| 45:17        | 66:18  | 85:11-13 | 135:19-136:11 |
| 46:2         | 69:16  | 87:9     | 146:17-147:9  |
| 48:5         | 70:17  | 93:14    | 151:21        |
| 48:17        | 71:1-5 | 96:12    | 152:5         |
| 49:13        | 76:4   | 101:19   | 152:21        |
| Errata Sheet |        |          |               |

HEA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Ray Cureton.

**Ray Cureton (August 30, 2022)**

|            |       |              |              |
|------------|-------|--------------|--------------|
| 17:15      | 62:11 | 80:1         | 144:15-20    |
| 19:7-11    | 62:18 | 80:15        | 150:21-151:9 |
| 22:22      | 69:21 | 85:1         | 151:14-153:3 |
| 30:10      | 72:11 | 90:11        | 153:16       |
| 31:6       | 72:17 | 90:22        | 158:17       |
| 31:15-32:1 | 73:6  | 91:20        | 159:9        |
| 38:13      | 75:10 | 104:11       | 159:13       |
| 45:22      | 75:18 | 107:3-9      |              |
| 46:5-15    | 76:5  | 123:19       |              |
| 58:22      | 78:5  | 129:14-130:2 |              |

HEA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Sherry Spires.

**Sherry Spires (August 19, 2022)**

|       |       |
|-------|-------|
| 18:20 | 37:10 |
|-------|-------|

|       |       |
|-------|-------|
| 20:7  | 37:20 |
| 21:16 | 38:8  |
| 25:19 | 38:19 |
| 34:5  | 79:11 |

HEA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Krystal Riddle.

**Krystal Riddle (August 19, 2022)**

|              |          |
|--------------|----------|
| 31:5-7       | 83:7-12  |
| 32:22-33:2   | 141:6    |
| 67:14-16     | 154:2-9  |
| 77:20 - 78:9 | 197:7-9  |
| 82:16-20     | 199:2-20 |
|              | 204:21   |

HEA reserves the right to object to the deposition testimony designated by the other parties on or before the deadline set forth by this Court or as otherwise permitted by the Court, the Federal Rules of Civil Procedure, or the Federal Rules of Evidence.

Respectfully submitted this 2nd day of February 2023,

*/s/ T. Matthew Miller*

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T. Matthew Miller (ASB-2129-I66T)

*One of the Attorneys for Defendant*

*Hyundai ENG America, Inc.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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*/s/ T. Matthew Miller*

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